

Matter ID 18-0105565

STATE OF MARYLAND**v.****TERANCE FALTER****IN THE DISTRICT COURT FOR****ANNE ARUNDEL COUNTY, MARYLAND****CASE NO. D-07-CR-18-000558**

DEFENSE MOTIONS
ENTRY OF APPEARANCE
DEMAND FOR SPEEDY TRIAL
DEMAND FOR PRELIMINARY HEARING
REQUEST FOR DISCOVERY AND INSPECTION
DEMAND FOR CHEMIST OR TECHNICIAN
DEMAND FOR AFFIANTS
DEMAND FOR DISCOVERY FOR VIOLATION OF PROBATION

Please enter the **Appearance** of the Office of the Public Defender as attorney for the above-named Defendant. This entry of appearance shall be deemed to incorporate by reference and include the filing of the Defendant's Omnibus Motion, pursuant to Maryland Rule 4-251, copies of which are on file with the Clerk of the Court and the Office of the State's Attorney.

The Defendant demands a **Speedy Trial** for the above-captioned matter.

That if Defendant is charged with a felony not within the jurisdiction of the District Court and entitled to a Preliminary Hearing then Defendant demands a **Preliminary Hearing** pursuant to Rule 4-221.

The Defendant respectfully requests the State provide information pursuant to **Discovery and Inspection**, MD. RULE 4-262(a)-(d), and provide, including but not limited to, full discovery of any statements of the Defendant and/or Co-defendant; the name, address, and any statements of all the State's witnesses; all material and information that relates to the acquisition of any such statements; all relevant material and information regarding searches, seizures, surveillance, and pretrial identification; the name, address, subject matter, and substance of the findings or opinions of any experts with a summary of the grounds for each opinion; the opportunity to inspect, copy, and photograph all evidence, documents, and reports intended for use at trial and any property of the Defendant; all material and information which tends to negate or mitigate guilt or punishment, or which tends to impeach a State's witness. This request is not intended to act as a limitation of the responsibility of the Office of the State's Attorney to provide discovery in accordance with any other rules or laws.

Further, the Defendant requests any and all video/body camera video/dash camera video/audio/radio recordings in the above-captioned case. The Defendant also demands certified copies of any police reports, CAD notes, 911 calls, and other transmissions related to the above-captioned case.

The Defendant demands the **presence of the lawful owner of the motor vehicle** that has been allegedly operated, used or possessed without the owner's permission, pursuant to MD. CODE ANN., CRIM. LAW § 7-105.1(c)(2).

The Defendant demands the **presence of the Chemist**, analyst, and any person in the chain of custody, as well as any **Technician** at the trial pursuant to MD. CODE ANN., CTS & JUD. PROC. § 10-306, § 10-914(f) & § 10-1003.

The Defendant demands the **presence of all Affiants** at trial pursuant to MD. CODE ANN., CRIM. LAW § 5-705(c)(2). The Defendant further demands any statements made orally, in writing, recorded electronically, or otherwise by the Affiants.

In violation of probation cases, the Defendant demands the **presence of any agent who filed a violation report** with the Court. Additionally, pursuant to Rule 3-421, the Defendant demands the **State identify and provide** any and all materials relating to the Defendant's probation, including the case file for the Defendant maintained by the Department of Parole & Probation (which includes call logs, kiosk logs, sign-in sheets, treatment provider communications and the agent(s)' notes).

In accordance with Rule 4-262(h), the materials requested in this Motion include any and all supplemental discovery obtained by the State's Attorney and shall be provided prior to the date of trial.

OFFICE OF THE PUBLIC DEFENDER

/s/Karl H. Gordon

Karl H. Gordon
CPF No. Karl
Assistant Public Defender
Glen Burnie District Court
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(410) 412-7102

CERTIFICATE OF SERVICE

I HEREBY CERTIFY on May 14, 2018, a copy of the foregoing was electronically delivered to the State's Attorney's Office via MDEC E-FILING..

/s/Karl H. Gordon

Karl H. Gordon
CPF No. Karl